

Brandon-Meion : Brown©

P.O. Box 84

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Date: July 7, 2025

United States Courts  
Southern District of Texas  
FILED

JUL 10 2025

Clerk of the Court

United States District Court

Southern District of Texas

515 Rusk Street

Houston, TX 77002

RE: Emergency Filing – Request for Custodial Standing and Federal Relief

To the Honorable Clerk,

Please accept for filing the enclosed Emergency Motion and supporting exhibits on behalf of my minor child, Peter-Eugene : Alvarado©, for whom I seek to establish Next Friend legal standing. The motion seeks immediate federal protection due to civil rights violations, medical neglect, and ADA noncompliance currently taking place at the Brazoria County Jail.

Enclosed documents include:

- Emergency Motion for Custodial Standing and Federal Protection
- Exhibit A – Declaration of Custody and Disability (Notarized)
- Exhibit B – Affidavit of Truth (Notarized)
- Exhibit C – Violation Summary and Legal Basis

I respectfully request the Court to docket this filing and grant emergency consideration based on the urgent health and safety risks to the minor involved. Please notify me promptly of any deficiencies or next steps required.

Respectfully submitted,



Brandon-Meion : Brown©



**Emergency Motion for Custodial Standing / Next Friend**

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Brandon-Meion : Brown, as Next Friend of

Peter-Eugene : Alvarado, a Disabled Minor

Plaintiff

v.

Brazoria County Jail, et al.

Defendants

COMES NOW Brandon-Meion : Brown, parent and advocate for Peter-Eugene : Alvarado, a 17-year-old mentally disabled minor, and respectfully submits this Emergency Motion for Recognition as Next Friend. Peter is presently held in the adult mental health section of the Brazoria County Jail, denied post-surgical heart medication, subjected to isolation, and has no functional literacy. The movant seeks to intervene on his behalf for emergency protection, ADA relief, and to prevent unlawful adult court transfer.

**\*\*PLEASE SIGN IN BLUE INK\*\***

Executed on: July 7, 2025

Signature: Brandon Meion Brown

Printed Name: Brandon-Meion : Brown

Pennsylvania  
STATE OF ~~TEXAS~~

COUNTY OF Beaver

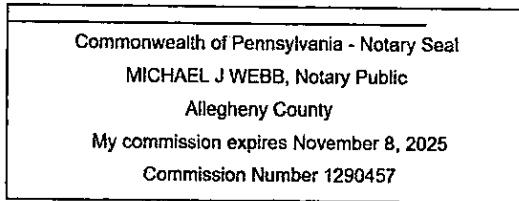
This instrument was acknowledged before me on the 7th day of July, 2025, by Brandon-Meion : Brown, known to me or proven by satisfactory evidence to be the person whose name is subscribed to the foregoing document, and who executed the same for the purposes and consideration therein expressed.

Michael J Webb

Notary Public Signature

My Commission Expires: 11/08/2025

Notary Seal:



Notarized remotely online using communication technology via Proof.

# UNITED STATES DISTRICT COURT

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SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

PETER-EUGENE : ALVARADO©, a minor child  
by Brandon-Meion : Brown©, next friend  
Petitioner,

v.

CARY FADEN, Court-Appointed Attorney  
GREG HILL, Judge, 149th District Court, Brazoria County  
BRAZORIA COUNTY SHERIFF'S OFFICE / JAIL  
JOHN DOE, Brazoria County District Attorney  
LIGHTHOUSE LEARNING CENTER, Public School Institution  
Respondents.

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Civil Action No. \_\_\_\_\_

## EXHIBIT A

**Declaration of Custody and Disability**

Executed and Notarized on July 7, 2025

Submitted in support of emergency standing, medical protection, ADA enforcement, and  
custodial declaration under U.S. and international law.

**Declaration of Custody and Disability**

I, Brandon-Meion : Brown, declare under penalty of perjury that I am the parent of Peter-Eugene : Alvarado and that he suffers from diagnosed mental disabilities, cannot read or write, and has undergone recent heart surgery. I have actively supported and cared for him throughout his life and seek immediate standing to represent him in legal and medical matters.

**\*\*PLEASE SIGN IN BLUE INK\*\***

Executed on: July 7, 2025

Signature: Brandon Meion Brown

Printed Name: Brandon-Meion : Brown

~~PA~~ Pennsylvania  
STATE OF ~~TEXAS~~

COUNTY OF Beaver

This instrument was acknowledged before me on the 7th day of July, 2025, by Brandon-Meion : Brown, known to me or proven by satisfactory evidence to be the person whose name is subscribed to the foregoing document, and who executed the same for the purposes and consideration therein expressed.

Michael J Webb

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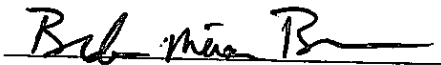
Notary Seal:

Commonwealth of Pennsylvania - Notary Seal  
MICHAEL J WEBB, Notary Public  
Allegheny County  
My commission expires November 8, 2025

which-combined with his developmental and mental health diagnoses-makes his detention on the adult side of the jail especially dangerous and harmful. These circumstances demand immediate federal review, ADA protection, and custodial-intervention.

The original affidavit, duly signed and notarized, is attached and incorporated herein by reference as Exhibit B.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brandon-Meion Brown", is written over a horizontal line.

Brandon-Meion : Brown(c)

P.O. Box 84, Clute, Texas [77531]

Phone: 281-908-6300 | Email: triocouriers@gmail.com

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS - HOUSTON DIVISION

PETER-EUGENE : ALVARADO(c), a minor child

by Brandon-Meion : Brown(c), next friend

Petitioner,

v.

CARY FADEN, Court-Appointed Attorney

GREG HILL, Judge, 149th District Court

BRAZORIA COUNTY SHERIFF'S OFFICE / JAIL

JOHN DOE, Brazoria County District Attorney

LIGHTHOUSE LEARNING CENTER

Respondents.

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Civil Action No. \_\_\_\_\_

EXHIBIT B

Affidavit of Truth (Already Notarized)

Executed and Notarized on July 7, 2025

This exhibit is submitted in support of the federal record concerning violations of medical, civil, and disability rights against the minor child, Peter-Eugene : Alvarado(c), while in state custody.

It is affirmed that Peter was denied his prescribed heart medication for an extended period while confined in the Brazoria County Jail. Although the facility resumed treatment in late June 2025, the prior delay placed Peter at serious medical risk and psychological harm.

Additionally, Peter was sexually assaulted at the age of 12. He carries ongoing trauma from that incident,



**Affidavit of Truth**

I, Brandon-Meion : Brown, affirm the truth of the facts stated herein regarding the treatment of my son, Peter-Eugene : Alvarado, his disability, denial of medication, emotional trauma, and lack of accommodations in Brazoria County Jail. I assert these facts in good faith and under penalty of perjury under federal and state law.

**\*\*PLEASE SIGN IN BLUE INK\*\***

Executed on: July 7, 2025

Signature: Brandon Meion Brown

Printed Name: Brandon-Meion : Brown

~~PA~~ Pennsylvania  
STATE OF ~~TEXAS~~

COUNTY OF Beaver

This instrument was acknowledged before me on the 7th day of July, 2025, by Brandon-Meion : Brown, known to me or proven by satisfactory evidence to be the person whose name is subscribed to the foregoing document, and who executed the same for the purposes and consideration therein expressed.

Michael J Webb

Notary Public Signature

My Commission Expires: 11/08/2025

Notary Seal:

Commonwealth of Pennsylvania - Notary Seal  
MICHAEL J WEBB, Notary Public  
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# UNITED STATES DISTRICT COURT

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JOHN DOE, Brazoria County District Attorney  
LIGHTHOUSE LEARNING CENTER, Public School Institution  
Respondents.

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Civil Action No. \_\_\_\_\_

## EXHIBIT C

### Violation Summary and Legal Basis

This Exhibit provides a detailed list of the violations committed by the Respondents, with supporting statutory and case law references.

1. **\*\*Denial of Medical Treatment (Heart Medication)\*\***
  - 42 U.S.C. § 1983 – Civil action for deprivation of rights
  - Estelle v. Gamble, 429 U.S. 97 (1976) – Deliberate indifference to serious medical needs violates the Eighth Amendment
2. **\*\*Failure to Provide ADA Accommodations\*\***
  - Americans with Disabilities Act of 1990, Title II, 42 U.S.C. § 12132
  - 28 C.F.R. Part 35 – Nondiscrimination on the Basis of Disability in State and Local Government Services

- Tennessee v. Lane, 541 U.S. 509 (2004) – Individuals with disabilities must have meaningful access to public services

3. **\*\*Wrongful Detention of a Minor with Disability in Adult Facility\*\***

- Federal Juvenile Justice and Delinquency Prevention Act (JJDPA), 34 U.S.C. § 11101 et seq.
- 42 U.S.C. § 5601 – Youth must be separated from adults and treated with rehabilitative intent

4. **\*\*Educational Negligence and Failure to Protect\*\***

- 20 U.S.C. § 1400 et seq. – Individuals with Disabilities Education Act (IDEA)
- Endrew F. v. Douglas County School Dist., 580 U.S. 386 (2017) – Schools must offer an educational plan reasonably calculated to enable progress

5. **\*\*Judicial Bias and Conflict of Interest\*\***

- Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009) – Judicial recusal is required where bias is probable

6. **\*\*Failure of Counsel to Act in Child's Best Interest\*\***

- Strickland v. Washington, 466 U.S. 668 (1984) – Ineffective assistance of counsel violates Sixth Amendment

7. **\*\*Violation of Civil and Parental Rights\*\***

- Troxel v. Granville, 530 U.S. 57 (2000) – The liberty interest of parents in the care and custody of their children is a fundamental right
- Santosky v. Kramer, 455 U.S. 745 (1982) – Parental rights cannot be terminated without due process

These violations constitute a pattern of neglect, abuse, and systemic discrimination against a disabled minor, warranting immediate federal intervention and relief.